



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

MEMO ENDORSED

June 30, 2008

BY FAX

Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street, Room 640
New York, New York 10007

Re: United States v. Philip Wong,
07 Cr. 1148 (CM)

Re: United States v. Philip Wong,
08 Cr. 502 (CM)

7/1/08
Matter Adj to 7/23/08
At 9:30am. Time Excluded
in the interest of justice.

Colleen McMahon

Dear Judge McMahon:

The Government respectfully writes to request an adjournment of the next pretrial conference in the case, which is presently scheduled for Wednesday July 2, 2008, at 9:30 a.m. The parties are far along into plea discussions and hope to have a plea agreement reached shortly. It is doubtful, however, that the agreement will be finalized as of this Wednesday. Accordingly, the parties request that the conference be adjourned until the week of July 21, 2008. In the event the parties negotiate a plea agreement prior to that date, they will alert the Court.

The Government respectfully requests that time be excluded for purposes of the Speedy Trial Act from today until the date of the next pretrial conference. The Government makes this request to permit the Government and the defense time to consider the possibility of a disposition before trial. The ends of justice served by such a continuance outweigh the best interests of the

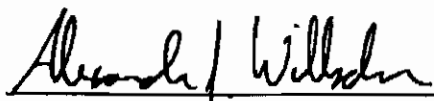
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public and the defendant in a speedy trial. See 18 U.S.C. § 3161(h)(8)(A). I have discussed this request with Martin Cohen, Esq., counsel for the defendant, who consents to this request.

Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney
Southern District of New York

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cc: Martin Cohen, Esq. (By fax)